

December 20th, 2012

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Progeny LMS and WISPA Part 15 Joint Test
WP Docket 11-49

Dear Ms. Dortch,

My name is Robbie Wright and I'm the owner, along with my wife, of Siuslaw Broadband. We're a small ISP on the Oregon coast providing internet services in Oregon. We've been around for two years now and in that time have attracted quite a few new clients, have been nominated every year we've been in business for the Chamber of Commerce's Excellence in Customer Service Award, and have found many unique ways of giving back to the community.

We utilize primary Ubiquiti wireless equipment through our network and have deployed a number of 900mhz radios in our quest to reach rural areas that have no options for high speed internet. While we are a relatively small WISP and have roughly 20 subscribers utilizing the 900mhz frequency, we are the only option for internet that they have. We have gone through the first round of unfortunate interference when the utility company deployed their smart meters. Initially, we lost a number of 900mhz customers, but we were able to work through the issues with the utility on the interface they were causing and ultimately restore service to most of our 900mhz clients. On the Oregon coast, we have excessive amounts of large trees that only a 900mhz signal can reach through due to its propagation characteristics when compared to other unlicensed frequencies. Without this frequency we would not be able to serve some of our customers, leaving them with no option for high speed internet.

We have reviewed in depth the joint report and filing prepared by Progeny and by WISPA. After reviewing the details of the report, it is clear that the Progeny equipment would clearly impact the 900mhz spectrum for us, forcing us to shut down all of our clients in that spectrum. Our access points are mounted high on a cell phone tower and the dense deployment proposed by Progeny along with the duty cycle of their radios would cause an unacceptable level of interference for our network and our customers.

We experienced similar issues with the utility company's smart meters. They would change frequencies independently of each other causing random interference across the entire spectrum. Looking at the signal charts from the test report, they demonstrate we'd experience the same types of events if the Progeny equipment were to be deployed.

The amount of interference the joint test purports to display would cause an unacceptable level of interference for our customers. It would lead to dramatically decreased signal levels and severely hamper the amount of throughput available in our 900mhz system, crippling all of our clients. We would no longer be able to serve those customers and attempt to help them switch to another ISP, mostly likely a satellite provider with much poorer performance. If satellite was not available, those customers would have no access to high speed internet, through us or any other ISP.

We urge the FCC to deny Progeny's claim to a nationwide, exclusive licensed access to the 900mhz spectrum. Please carefully review the responses from other wireless ISP as many of them will be confronted with the same issues as Siuslaw Broadband. Progeny's product represents a significant issue as it will create unacceptable levels of interference and force us to shutter our 900mhz.

Sincerely,
Robbie Wright
CEO, Siuslaw Broadband